



INTERMOUNTAIN WEST JOINT VENTURE

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FAX

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To: Financial Assistance Program Division
USDA Natural Resources Conservation Serv
Environmental Quality Incentive Program

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REMARKS:

Please include and consider these comments as part of the public record for this USDA Program.

Thank you.



INTERMOUNTAIN WEST JOINT VENTURE

April 9, 2009

USDA Natural Resources Conservation Service
Financial Assistance Programs Division
Environmental Quality Incentives Program Comments
1400 Independence Ave.,
Washington, DC 20250-2890

Dear NRCS:

The Intermountain West Joint Venture (IWJV) is a coalition of 15 conservation agencies, non-profit conservation organizations, and non-governmental entities representing industry and agriculture that are collectively dedicated to the conservation of birds and their habitats across parts of eleven states in the Intermountain West. We are actively engaged with the Natural Resources Conservation Service (NRCS), Farm Services Agency, and agricultural producers to integrate wildlife with agricultural objectives and build local partnerships necessary to conserve avian habitats across the vast Intermountain West landscape.

We are currently assisting NRCS with Farm Bill program implementation by providing IWJV funding to help NRCS establish new Biologist or Range Conservationist positions in NRCS Field Offices. This increased Farm Bill delivery capacity is helping NRCS provide the technical assistance needed to assist producers in achieving their wildlife conservation objectives consistent with the IWJV's ecoregional bird conservation planning.

Our partnership has developed an IWJV Farm Bill Initiative and has employed a Farm Bill Coordinator to work with a wide range of conservation interests to facilitate effective Farm Bill conservation delivery. The following comments are a product of our analysis of the Interim Rule.

COMMENTS ON ENVIRONMENTAL QUALITY INCENTIVES PROGRAM

We offer the following comments on the EQIP Interim Rule:

- The Environmental Quality Incentives Program (EQIP) is an important tool to address fish and wildlife conservation. It provides agricultural producers with cost

share and incentive payments to further the conservation of many species, and specifically targets at-risk species. There is often little economic incentive for agricultural producers to do this work without financial assistance. Therefore, fish and wildlife opportunities under EQIP should be maximized.

- NRCS is commended for continuing to allow the advent of ranking pools to focus on key conservation issues (Section 1466.20 B). This allows the State Conservationist, with advice from the State Technical Advisory Committee, to establish strategic geographical habitat initiatives to address fish and wildlife concerns. In prior years this has been an effective tool to further the conservation of species of greatest conservation need and we encourage NRCS to continue this approach.
- In Section 1466.23 Payment Rates (c)(iv); At-risk species should be listed as a conservation need, enabling the State Conservationist to give higher priority for compensating producers for income forgone. Specifically, declining species are an important focus of society and EQIP. However, landowners have little economic incentive to manage for these species because of costs which they can not afford. Cost share and incentive payments should be maximized to help agricultural producers further the conservation of these species. Higher payment rates are key to affecting the conservation of species in most need.
- The Interim Final Rule requests comments on the definition of at-risk species that USDA has been using for implementing EQIP. We recommend that at-risk species should be determined at the state level in consultation with the state fish and wildlife agency and U.S. Fish and Wildlife Service.
- The EQIP program has been used on federal and state lands that are part of a landowner's agricultural operations. The EQIP funds, in conjunction with other Federal and State funding, has improved watershed health and fish and wildlife habitat at the landscape scale. Therefore, we recommend that NRCS continue to allow this opportunity to persist.
- The Explanatory Statement of the Committee of Conference for the 2008 Farm Bill stated that fuel and forest management is added to the list of activities for which the Secretary will assist producers in making cost-effective changes. However, the interim rule does not mention fuels management. Therefore, the rule should be amended to include fuels management. This provides an opportunity to reduce losses through catastrophic wildfires while also improving fish and wildlife habitat.

Thank you for the opportunity to comment on the EQIP Interim Rule. We sincerely appreciate your consideration of this request and in working to coalesce agricultural and wildlife conservation objectives in the implementation of the 2008 Farm Bill.

Sincerely,



Larry L. Kruckenberg, Chairman

Note: The Intermountain West Joint Venture is a regional coalition of organizations, agencies, and corporations committed to bird conservation in the Intermountain West. The group includes representatives of Ducks Unlimited, Inc., National Audubon Society, Mule Deer Foundation, Montana Fish, Wildlife & Parks, Wyoming Game & Fish Department, Idaho Department of Fish and Game, Utah Division of Wildlife Resources, Nevada Division of Wildlife, Arizona Game and Fish Department, Colorado Division of Wildlife, ConocoPhillips, PacifiCorp, Flying A Ranch, and representatives of the U.S. Fish and Wildlife Service and Natural Resources Conservation Service who provide wildlife and habitat resource data, and consultation relative to Farm Bill statutes, regulations, and programs. The views and positions of the Intermountain West Joint Venture group may not represent the official policy of individual organizations and agencies. For more information, please see the Intermountain West Joint Venture website at www.iwiv.org

Thank you for the opportunity to comment on the WHIP Interim Rule. We sincerely appreciate your consideration of this request and in working to coalesce agricultural and wildlife conservation objectives in the implementation of the 2008 Farm Bill.

Sincerely,



Larry L. Kruckenberg, Chairman

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